

JOSEPH & HERZFELD LLP
Attorneys at Law

Charles Joseph
Diane Hester
Michael D. Palmer
D. Maimon Kirschenbaum
Brian P. Fredericks
Michael DiChiara*

*Also admitted in New Jersey and Massachusetts

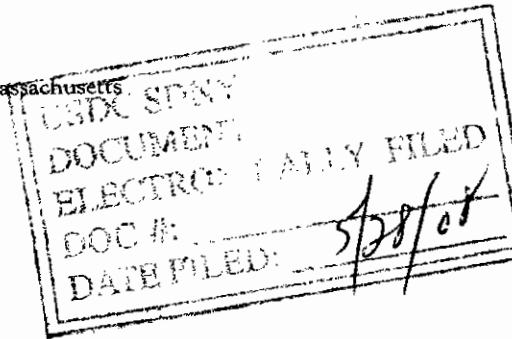
Of counsel:

Andrew Dwyer**

**Also admitted in New Jersey

757 Third Avenue, 25th Floor
New York, NY 10017
Phone: (212) 688-5640
Fax: (212) 688-2548

www.jhllp.com



May 23, 2008

VIA FACSIMILE
(212) 805-7941

Hon. Judge Loretta A. Preska
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl Street, Rm. 1320
New York, NY 10007

Re: *Pachecogil, et al. v. Sage American Catering, Inc., et al.*
Docket No.: 07CV10652

Dear Hon. Judge Preska:

We represent Plaintiffs in the above-captioned matter. I write pursuant to the parties' representation to the Court that they would provide the Court with a status update by today.

Discovery in this case has commenced. During discovery, Plaintiffs have learned that there are additionally parties that should properly be named as Defendants in this Lawsuit. Further, Plaintiffs have determined that it is in their best interests to prosecute this matter individually rather than as a collective action under the FLSA § 216(b).

Accordingly, Plaintiffs respectfully request that they be given permission to amend their Complaint to reflect these changes pursuant to FRCP § 15. Defendants do not oppose this request.

① Such amendment shall be made by June 13.
② Counsel shall report on the status of the action no later than June 23.

SO ORDERED
Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE
May 27, 2008

Concurrent with discovery, the parties have engaged in meaningful settlement discussions. The parties estimate that there is a substantial likelihood that they will reach a resolution within the next month. Accordingly, we respectfully request, on behalf of both parties, an additional one-month stay, until June 23, 2008, to further update the Court.

Thank you for your attention to this matter.


Respectfully submitted,

JOSEPH & HERZFELD LLP



D. Maimon Kirschenbaum (DK-2338)

cc: Wendy J. Mellk, Esq.

So Ordered: 
Honorable Loretta A. Preska

May 27, 2008